U.S. Department of Justice



United States Attorney Southern District of New York

The Jacob K. Javits Federal Building 26 Federal Plaza

New York, NY 10278

July 22, 2025

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MEMORANDUM ENDORSED

Request for Filing Under Seal

The Honorable Gregory H. Woods United States District Judge Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl St. New York, NY 10007-1312

> Re: *United States v. Wilkins Estrella and Charlene Marte*, 25 Cr. 136 (GHW)

Dear Judge Woods:

The parties respectfully submit this joint letter to request the scheduling of change-of-plea hearings for defendants Wilkins Estrella and Charlene Marte.

After conferring with defense counsel regarding their availability, the Government asks that the status conference currently scheduled for July 28, 2025 at 1:00 p.m. be converted to a change-of-plea hearing for defendant Marte, and that a separate change-of-plea hearing be scheduled for defendant Estrella on August 6, 2025 at 2:00 p.m.

Time has been excluded as to both defendants until July 28, 2025. The Government requests, with defense counsel's consent, that time be further excluded as to defendant Estrella from July 28, 2025 until August 6, 2025. The ends of justice served by excluding such time outweigh the interests of the public and defendant Estrella in a speedy trial because it will allow the defendant to confer with his defense counsel in preparation for the change of plea.

Application granted. The Court will conduct a change of plea hearing for Defendant Marte on July 28, 2025 at 1:00 p.m. and Respectfully submitted, will conduct a change of plea hearing for Defendant Estrella on August 6, 2025 at 2:00 p.m. The Court will issue a separate order excluding time through the latter date with respect to Defendant Estrella.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 42. by:

SO ORDERED.

Dated: July 23, 2025 New York, New York

JAY CLAYTON United States Attorney

Jame Y. Chong

Assistant United States Attorney

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By CM/ECF: Alberto Ebanks, Esq. (counsel for Alberto Ebanks) Jason Foy, Esq. (counsel for Charlene Marte)